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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *UPL* DEPUTY

CASE UNSEALED PER ORDER OF COURT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
June 2017 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JACOB BURRELL CAMPOS,  
  
Defendant.

Case No. 18CR3554 H

I N D I C T M E N T

Title 18, U.S.C., Sec. 1960(a) -  
Unlicensed Money Transmitting  
Business; Title 31, U.S.C.,  
Sec. 5318(h) - Failing to Maintain  
Anti-Money Laundering Program;  
Title 18, U.S.C., Sec. 1956(a)(2)(A) -  
Money Laundering; Title 18, U.S.C.,  
Sec. 371, and Title 31, U.S.C.,  
Sec. 5324(c) - Conspiracy to  
Structure; Title 18, U.S.C.,  
Sec. 982(a)(1) and (b)(1), and  
Title 31, U.S.C., Sec. 5317(c)(1)(A)  
and (B) - Criminal Forfeiture

The grand jury charges:

Count 1

From on or about January 2015 to on or about April 2016, within  
the Southern District of California and elsewhere, defendant JACOB  
BURRELL CAMPOS did knowingly conduct, control, manage, supervise, direct  
and own at least part of a money transmitting business affecting  
interstate and foreign commerce which failed to comply with the money

*cc: Pretrial*

*1 RMC*

1 transmitting business registration requirements under Title 31, United  
2 States Code, Section 5330, and the regulations prescribed thereunder.  
3 All in violation of Title 18, United States Code, Section 1960(a).

4 Count 2

5 From on or about January 2015 to on or about April 2016, within the  
6 Southern District of California and elsewhere, defendant JACOB BURRELL  
7 CAMPOS, a money service business within the meaning of 31 CFR  
8 1010.100(ff), and a financial institution within the meaning of 18 USC  
9 5312(a)(2)(R), did knowingly and willfully fail to develop, implement  
10 and maintain an effective anti-money laundering program, including the  
11 development of internal policies, procedures and controls, reasonably  
12 designed to prevent money laundering and the financing of terrorist  
13 activities, as part of a pattern of illegal activity involving more than  
14 \$100,000 in a twelve-month period.

15 All in violation of Title 31, United States Code, Sections 5318(h) and  
16 5322(b), and Title 31, Code of Federal Regulations, Section 1022.210.

17 Counts 3-30

18 On or about the dates listed below, according to each count, within  
19 the Southern District of California and elsewhere, defendant JACOB  
20 BURRELL CAMPOS did transmit and transfer monetary instruments, that is,  
21 United States currency, from a place in the United States to a place  
22 outside the United States, with the intent to promote the carrying on  
23 of specified unlawful activity, that is, conducting an unlicensed money  
24 transmitting business in violation of Title 18, United States Code,  
25 Section 1960:

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COUNT	DATE	FROM	TO	AMOUNT
3	February 26, 2015	Jacob Julio Burrell Campos, Mission Federal Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$13,200.00
4	March 10, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$11,500.00
5	March 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,460.00
6	March 23, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$14,000.00
7	March 25, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,100.00
8	March 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,800.00
9	April 1, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,500.00
10	April 6, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,600.00
11	April 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,600.00

COUNT	DATE	FROM	TO	AMOUNT
12	April 15, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,790.00
13	April 20, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$28,990.00
14	April 24, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$26,390.00
15	April 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$19,190.00
16	April 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$25,190.00
17	May 5, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,245.01
18	May 8, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,690.00
19	May 12, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$29,390.00
20	May 19, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$47,390.00
21	May 21, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,190.00

COUNT	DATE	FROM	TO	AMOUNT
22	May 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$57,870.84
23	May 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$39,725.00
24	June 3, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$55,940.00
25	June 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$50,281.00
26	June 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$53,256.24
27	June 22, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$82,227.73
28	June 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$52,099.38
29	November 3, 2015	Jacob Julio Burrell Campos, San Diego County Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$24,550.00
30	February 12, 2016	Jacob Julio Burrell Campos, San Diego County Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,199.60

All in violation of Title 18, United States Code, Section 1956(a)(2)(A).

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1 Criminal Forfeiture

2 1. Upon conviction of the offense alleged in Count 1 (conducting  
3 an unlicensed money transmitting business) or any of the offenses  
4 alleged in Counts 3 through 30 (money laundering) of this indictment,  
5 defendant JACOB BURRELL CAMPOS shall forfeit to the United States of  
6 America, pursuant to Title 18, United States Code, Section 982(a)(1),  
7 any property, real and personal, involved in such offenses, and any  
8 property traceable to such property.

9 2. In the event that any of the property described above, as a  
10 result of any act or omission of the defendant:

- 11 a. cannot be located upon the exercise of due diligence;  
12 b. has been transferred or sold to, or deposited with, a  
13 third party;  
14 c. has been placed beyond the jurisdiction of the court;  
15 d. has been substantially diminished in value; or  
16 e. has been commingled with other property which cannot be  
17 divided without difficulty,

18 the United States of America shall be entitled to forfeit substitute  
19 property pursuant to Title 21, United States Code, Section 853(p), as  
20 incorporated by Title 18, United States Code, Section 982(b)(1).

21 All in violation of Title 18, United States Code, Sections 982(a)(1)  
22 and (b)(1).

23 3. Upon conviction of the offense alleged in Count 31 of this  
24 indictment (conspiracy to structure the importation of monetary  
25 instruments), defendant JACOB BURRELL CAMPOS shall forfeit to the United  
26 States of America, pursuant to Title 31, United States Code,  
27 Section 5317(c)(1)(A), any property, real and personal, involved in such  
28 offense, and any property traceable to such property.

1 4. In the event that any of the property described above, as a  
2 result of any act or omission of the defendant:

3 a. cannot be located upon the exercise of due diligence;

4 b. has been transferred or sold to, or deposited with, a  
5 third party;

6 c. has been placed beyond the jurisdiction of the court;

7 d. has been substantially diminished in value; or

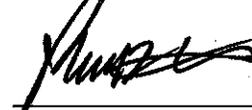
8 e. has been commingled with other property which cannot be  
9 divided without difficulty,

10 the United States of America shall be entitled to forfeit substitute  
11 property pursuant to Title 21, United States Code, Section 853(p), as  
12 incorporated by Title 31, United States Code, Section 5317(c)(B).

13 All in violation of Title 31, United States Code, Sections 5317(c)(1)(A)  
14 and (B).

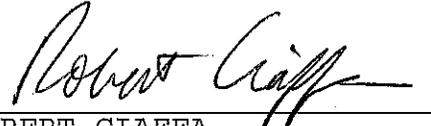
15 DATED: August 9, 2018.

16 A TRUE BILL:

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18 \_\_\_\_\_  
Foreperson

19 ADAM L. BRAVERMAN  
20 United States Attorney

21 By:   
22 \_\_\_\_\_  
23 ROBERT CIAFFA  
Assistant U.S. Attorney